

# AHMAD KESHAVARZ

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December 16, 2022

VIA ECF

Magistrate Judge Roanne L. Mann  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Status Report on Settlement Approval.**

***Galeas v. Houslanger & Associates, PLLC, et al., No. 1:19-cv-4270-PKC-RLM***

Dear Judge Mann:

We apologize for the late filing of this status report. A status report was not filed on December 2, 2022 as directed due to law office error – a scheduled deposition in another matter was abruptly and unilaterally cancelled, causing our office to scramble to rearrange our December schedule to accommodate, and unfortunately we neglected to address the status report due that day. This is not an excuse, and we will be more diligent in the future about complying with all deadlines set by the Court.

The Plaintiff Carlos Villalba, Administrator of the Estate of Ramon Galeas, has filed (through his probate counsel Judah Schwartz) a Lift Restrictions Petition which is pending in the Queens County Surrogate's Court. Given the straightforward nature of this process, we do not anticipate any issues with the Petition being granted after being reviewed by the court staff and presented to the judge.

However, the Surrogate's Courts in New York City continue to be caught up in a severe backlog as Your Honor may recall from the long process to substitute Mr. Villalba into this lawsuit. The Surrogate's Court notified us this morning, December 16, 2022, to allow up to eight weeks for them to review documents. **Exhibit A** (Message from Queens County Surrogate's Court). Accordingly, we request 75 days (until March 1, 2023) for the submission of the next status report, which will hopefully ensure it is the last status report and obviate the need for further extensions.

Respectfully,

/s/

Ahmad Keshavarz

cc: all counsel (via ECF)